

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492

Master Docket No. 13-cv-09116

Judge John Z. Lee

Magistrate Judge Geraldine Soat
Brown

**PLAINTIFFS' RESPONSE TO ARRINGTON'S
OBJECTION TO THE PROPOSED SETTLEMENT**

Plaintiffs join the NCAA's Response to Adrian Arrington's Objection to the Proposed Settlement. (Docket No. 238.) Like any other Class Member, Arrington is entitled to take a position on whether he supports the Settlement. Despite his initial support of and consent to the Settlement (along with multiple additional class representatives who all occupied the same status as class representatives), he is free to change his mind and has done so.¹ So be it. The fact that Arrington's concerns are based on a complete misapprehension of how the Settlement actually works (Docket No. 236) gives his viewpoint considerably less weight, but the larger point here is that the Court has already received hundreds of pages of briefing on this issue already. The latest views of Arrington and his current Counsel do not alter the landscape one bit.

¹ Any suggestion that Arrington did not *consent* to the Settlement, however, is demonstrably false. Arrington was made aware of the Settlement terms, he provided express consent to the Settlement, and he subsequently gave press interviews in support of the Settlement. While it may be true that Arrington's current handlers have successfully lobbied him to withdraw support of the Settlement, the idea that he never consented and supported the Settlement in the first place is an outright falsehood.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order:

- A. Overruling Arrington's objections;
- B. Denying Arrington's request for the appointment of new Lead or Class counsel in any capacity;
- C. Granting Plaintiffs' pending motion for preliminary approval of the Class Settlement; and
- D. Granting such further relief that the Court deems just and appropriate.

Date: November 16, 2015

Respectfully submitted,

By: /s/ Joseph J. Siprut

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Co-Lead and Settlement Class Counsel

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on November 16, 2015, a true and correct copy of the foregoing was filed electronically via CM/ECF, which caused notice to be sent to all counsel of record.

By: /s/ Joseph J. Siprut
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